

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-20451  
Hon. Jonathan J. C. Grey

TYLER ROSS,

Defendant.

\_\_\_\_\_ /

**ERRATA SHEET TO POST-HEARING BRIEF**

The following errors in the previously filed Post-Hearing Brief have come to undersigned counsel's attention, and they wish to now correct them:

1. The final paragraph on Page Three, as filed, reads:

(Although he - incredibly, in the view of the writers - denied making the statement attributed to him in the investigative material were "not right" that he in fact did not rely on them. *Id.*, at Page ID # 949) despite having testified that he had been truthful in his previous statements to the investigators. *Id.*, at Page ID # 943.)

When in fact it should read as follows:

(Although he - incredibly, in the view of the writers - denied making the statement attributed to him in the investigative material (*Id.*, at Page ID # 949), he testified that he had been truthful in his previous statements to the investigators. *Id.*, at Page ID # 943.)

2. As filed, the first sentence of the first full paragraph on Page Nine reads:

Moreover, Mr. Geoghan's testimony is wholly inconsistent with JP Morgan's interactions with ROCO not only in the years after the Chetrit transaction.

When in fact it should read as follows:

Moreover, Mr. Geoghan's testimony is wholly inconsistent with JP Morgan's interactions with ROCO in the years after the Chetrit transaction.

The writers apologize to the Court and counsel for these oversights.

Respectfully submitted,

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s/ N. C. Deday LaRene  
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DATED: February 29, 2024

### CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2024 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record and served it by email on United States Probation Officer Xia Vue at [xia\\_vue@miep.uscourts.gov](mailto:xia_vue@miep.uscourts.gov).

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